

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

**EDWIN HERNANDEZ,
ARLES GRANADOS LAZO, JOSE ORTEZ,
YERLIN ORTEZ, MARTIR SORTO and
SANTOS VALASQUEZ,**

Plaintiff,

v.

**GOLDEN APPLE, INC.,
POMODORO NORTH END, INC.,
MATT MURPHY’S PUB, INC.,
SIOBHAN CAREW and JONATHAN PELL,**

Defendants.

C.A NO. 1:13-cv-10394-WGY

**DEFENDANTS GOLDEN APPLE, INC., POMODORO NORTH END, INC., MATT
MURPHY’S PUB, INC., and SIOBHAN CAREW’S INITIAL DISCLOSURES
PURSUANT TO FEDERAL RULE OF CIVIL PROCEDURE 26(a)(1)**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), the defendants in the above-referenced matter, GOLDEN APPLE, INC., POMODORO NORTH END, INC., MATT MURPHY’S PUB, INC., and SIOBHAN CAREW hereby provides their initial disclosures to the plaintiffs Edwin Hernandez, Arles Granados Lazo, Jose Orteiz, Yerlin Orteiz, Martir Sorto and Santos Valazquez (collectively, the “Plaintiffs”).

- A. The name and, if known, the address and telephone number of each individual likely to have discoverable information and the subject of that information.

Plaintiff Edwin Hernandez

Plaintiff Arles Granados Lazo

Plaintiff Jose Orteiz

Plaintiff Yerlin Orteiz

Plaintiff Martir Sorto

Plaintiff Santos Valazquez

Siobhan Carew
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Brookline, MA 02445

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781-233-4138

Keeper of the Records
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Keeper of the Records
Matt Murphy's Pub Inc.
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Keeper of the Records
North End Pomodoro of Boston Inc.
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Alexander Alvarez
133 London Street
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Telephone Unknown

The foregoing witnesses are expected to testify regarding the hourly wages paid to the individual plaintiffs, to Jose Ortiz's position as kitchen manager and to the management of the businesses. The foregoing witnesses are expected to testify regarding employment schedules, hourly wages paid, hiring and firing of employees.

B. Copies of, or a description by category and location of, all documents, data compilations, and tangible things that are in the defendant's custody or control.

Beyond any previously filed exhibits which have been attached to prior pleadings filed in this matter, Defendants GOLDEN APPLE, INC., POMODORO NORTH END, INC., MATT MURPHY'S PUB, INC., and SIOBHAN CAREW maintain in her possession various correspondence (electronic) between she and Mr. Pell. Ms. Carew also will make available copies and/or cancelled checks of operating and payroll checks of the corporate defendants. Ms. Carew will also make available information relating to the United States Department of Labor investigation. Finally, Ms. Carew will also make available for inspection and copying all

foregoing documents, data compilations, and tangible things other than those protected by applicable privileges, including the work product doctrine.

C. A computation of any category of damages claimed.

The parties to this action have previously exchanged numerous calculations relating to any wages due to the Plaintiffs. Ms. Carew contends that the amount of wages or other compensation that she personally owes or the corporate defendants owe to the Plaintiffs is \$0.

D. No insurance agreement exists to Ms. Carew's knowledge.

Respectfully submitted,

Siobhan Carew, Individually,
GOLDEN APPLE, INC.,
POMODORO NORTH END, INC.,
MATT MURPHY'S PUB, INC.

By their attorney,

/S/ Patrick M. Troy

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Dated: December 27, 2013

CERTIFICATE OF SERVICE

I hereby certify that paper copies of the foregoing document will be sent to each party to this action by electronic and/or first class mail on this 27th day of December, 2013.

/s/ Patrick M. Troy
Patrick M. Troy